

August 15, 2025

VIA ELECTRONIC FILING

Honorable Jerrold N. Poslusny, Jr.  
Mitchell H. Cohen U.S. Courthouse  
400 Cooper Street, 4<sup>th</sup> Floor  
Courtroom 4C  
Camden, New Jersey 08101

Re: *In re Daryl Fred Heller*, Case No. 25-11354 (the “Debtor”)  
Joint Request for Immediate Status Conference

Dear Judge Poslusny,

The undersigned, counsel for Silverview Credit Partners, L.P.; the Prestige Funds; Chicago Atlantic Admin, LLC; GCC Investment Holdings LLC, Grizzly RE, LLC and NEO Mfg. MA, LLC; Steward Capital Holdings LP and Avenaero Holdings, LLC; and Steven Mitnick, Receiver for Golden Gate Investment Company, LLC and Paramount Management Group, LLC, write jointly to respectfully request an immediate status conference in the above-captioned matter. In light of the *Second Interim Report of Examiner, Edward A. Phillips* (the “Examiner”), filed on August 13, 2025 (the “Second Interim Report”), the parties believe it is imperative to be heard by the Court without delay to address the implications of the Second Interim Report and determine an appropriate path forward in this chapter 11 case given the various matters pending before the Court.

Relatedly, to preserve judicial efficiency and party resources for all involved while the case direction is clarified by the Court, the undersigned respectfully request that all dates and deadlines in connection with the above-captioned matter be held in abeyance. The undersigned submit that such relief is warranted to avoid unnecessary motion practice or procedural inefficiencies while certain threshold issues raised principally by the Second Interim Report are addressed. The undersigned believe that the requested relief is fair and appropriate under these rather unique and developing circumstances.

To put a finer point on it, the undersigned are deeply troubled by the conduct detailed in the Second Interim Report, which raises significant concerns regarding the Debtor’s stewardship of this estate. The undersigned are in the process of more fully reviewing all of the detail contained in the Second Interim Report and are evaluating the appropriate next steps.

The undersigned are available to appear at the Court’s convenience. Your Honor’s prompt attention to the matter is appreciated.

*In re Daryl Fred Heller*, Case No. 25-11354  
Joint Request for Immediate Status Conference  
August 15, 2025  
Page 2

Respectfully submitted,

Dated: August 15, 2025

ALSTON & BIRD LLP	STARK & STARK, P.C.
By: /s/ <i>Kimberly J. Schiffman</i> Gerard S. Catalanello, Esq. James J. Vincequerra, Esq. (admitted <i>pro hac vice</i> ) Kimberly J. Schiffman, Esq. (admitted <i>pro hac vice</i> ) 90 Park Avenue 15th Floor New York, New York 10016-1387 Telephone: (212) 210-9400 Facsimile: (212) 210-9444 Email: Gerard.Catalanello@alston.com James.Vincequerra@alston.com Kimberly.Schiffman@alston.com  – and –  Enrique Chaljub Garcia, Esq. (admitted <i>pro hac vice</i> ) 1201 West Peachtree Street Atlanta, Georgia 30309 Telephone: (404) 881-7000 Facsimile: (404) 881-7777 Email: Enrique.Chaljub@alston.com  <i>Counsel to Silverview Credit Partners, L.P.</i>	By: /s/ <i>Marshall T. Kizner</i> Marshall T. Kizner, Esq. Joseph H. Lemkin, Esq. 100 American Metro Boulevard Hamilton, NJ 08619-2319 Telephone: (609) 219-7449 Email: mkizner@stark-stark.com jlemkin@stark-stark.com  <i>Attorneys for Prestige Fund A, LLC, Prestige Fund A IV, LLC, Prestige Fund A IX, LLC, Prestige Fund B, LLC, Prestige Fund B II, LLC, Prestige Fund B IV, LLC, Prestige Fund B V, LLC, Prestige Fund B VI, LLC, Prestige Fund B VII, LLC, Prestige Fund B BTM I, LLC, Prestige Fund A II, LLC, Prestige Fund A V, LLC, Prestige Fund A VI, LLC, Prestige Fund A VII, LLC, Prestige Fund D, LLC, Prestige Fund D III, LLC, Prestige Fund D IV, LLC, Prestige Fund D V, LLC, Prestige Fund D VI, LLC, Prestige Fund D BTM I, LLC, WF Velocity I, LLC, WF Velocity Fund IV, LLC, WF Velocity Fund V, LLC, WF Velocity Fund VI, LLC and WF Velocity Fund VII, LLC (collectively, the “Prestige Funds”)</i>

*In re Daryl Fred Heller*, Case No. 25-11354  
Joint Request for Immediate Status Conference  
August 15, 2025  
Page 3

<b>HAYNES AND BOONE, LLP</b>  <i>By: /s/ Lauren M. Sisson</i> Richard S. Kanowitz Lauren M. Sisson 30 Rockefeller Plaza 26th Floor New York, NY 10112 Telephone: 212.659.7300 Email: richard.kanowitz@haynesboone.com lauren.sisson@haynesboone.com  <i>Counsel to Chicago Atlantic Admin, LLC</i>	<b>DICKINSON WRIGHT PLLC</b>  <i>By: /s/ Stephen M. Montgomery</i> Stephen M. Montgomery (TN BPR #026489) Admitted <i>pro hac vice</i> 424 Church Street, Suite 800 Nashville, TN 37219 Telephone: 615-620-1712 Email: SMontgomery@dickinson-wright.com  <i>Co-Counsel for GCC Investment Holdings LLC, Grizzly RE, LLC and NEO Mfg. MA, LLC</i>
<b>ARCHER &amp; GREINER, P.C.</b>  <i>By: /s/ Jerrold S. Kulback</i> Douglas G. Leney Jerrold S. Kulback 1025 Laurel Oak Road Voorhees, NJ 08043 Tel: (856) 795-2121 jkulback@archerlaw.com dleney@archerlaw.com  <i>Attorneys for Steward Capital Holdings LP; and Avenaero Holdings, LLC</i>	<b>S. MITNICK LAW PC</b>  <i>By: /s/ Marc D. Miceli</i> Steven Mitnick, Esq. Marc D. Miceli, Esq. PO Box 530 49 Old Turnpike Road Oldwick, New Jersey 08858 (908) 572-7275 E-Mail: smitnick@sm-lawpc.com mmiceli@sm-lawpc.com  <i>Attorneys for Steven Mitnick, Receiver for Golden Gate Investment Company, LLC and Paramount Management Group, LLC</i>

cc: Counsel for the Debtor (Via Email)